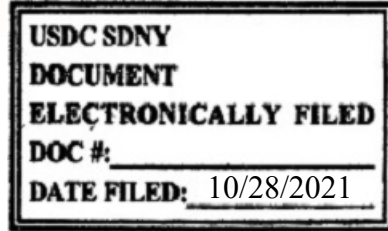




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October 27, 2021

VIA ECF

Hon. Barbara Moses, U.S.M.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

Re: Watts Constructors, LLC v. Insurance Company of the State of Pennsylvania
Case No. 21-cv-3254 (LJL)(BCM)

Dear Judge Moses

Our firm is co-counsel, with the firm of Whitfield & Eddy, P.L.C., for plaintiff Watts Constructors, LLC ("Plaintiff") in the above-referenced action. We write, with the consent of counsel for defendant Insurance Company of the State of Pennsylvania, Chiesa Shahinian & Giantomasi PC, to respectfully request that the Court adjourn the settlement conference presently scheduled for November 10, 2021 at 2:15 p.m.

The reason for this request is that the representative of Plaintiff that will be attending the conference with Plaintiff's counsels is a reservist in the United States Army who, until this past Monday, October 25, 2021, was deployed on active duty in Iraq for several months. Upon his return to the United States he has been required to quarantine due to the still ongoing COVID-19 pandemic and will then be debriefed for undetermined lengths of time, making his travel to New York practically impossible in the next two weeks. Plaintiff's counsel had previously informed Judge Liman of the possibility that we would need to request this adjournment at the initial scheduling conference held in this matter on July 6, 2021, at which time Judge Liman referred this matter to Your Honor for the aforementioned settlement conference.

We have consulted with Defendant's counsel regarding possible adjourn dates and are able to propose the following to the Court: December 6, 9, 13, or 17, 2021. In the event that the Court is not available on any of those days, we would be willing to arrange a conference call between the Court, Defendant's counsel and our office and our co-counsel to discuss alternative dates.

Hon. Barbara Moses, U.S.M.J.
October 27, 2021
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Thank you for the Court's consideration of Plaintiff's request.

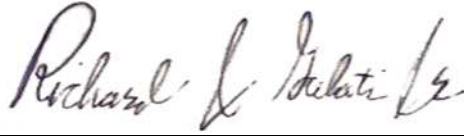
Application GRANTED. The settlement conference is hereby ADJOURNED to **December 6, 2021, at 2:15 p.m.** SO ORDERED.



Barbara Moses
United States Magistrate Judge
October 28, 2021

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP



By: Richard J. Galati, Jr., Esq.

cc: Gary Goudelock, Esq. (via ECF)
Marc Lepelstat, Esq. (via ECF)
Steven Katz, Esq. (via ECF)